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October 28, 2020

Via E-Filing

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's Intervention in
Numbering Resources Determinations
Columbia Rate Center – Midlands Technical College

Dear Ms. Boyd:

AT&T South Carolina ("AT&T") respectfully encloses for filing a Petition for Review of
Numbering Resources Determination in the Columbia rate center in the above-captioned matter.
In summary:

AT&T submitted an NXX Assignment Request via the Pooling Administration System
on October 19, 2020;

AT&T's customer requesting numbering resources is Midlands Technical College;

AT&T requested the assignment of ten thousands-blocks (other than with a 666 NXX) in
the Columbia rate center.

The request impacts the Columbia rate center;

At the time of the filing of the numbering resource request, the Columbia Rate Center had
an MTE of 171.045 and utilization of 26.068%.

By copy of this letter, I am serving a copy of this document on all parties of record as
indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

Enclosures

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S)
PETITION REQUESTING THE COMMISSION’S)
INTERVENTION IN NUMBERING RESOURCES)
DETERMINATIONS)
_____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE COLUMBIA RATE CENTER

AT&T South Carolina (“AT&T”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T’s application for use of numbering resources in the 839 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”¹ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective

¹ See, e.g., 47 C.F.R. §52.15.

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T's customer Midlands Technical College.

In support of this Petition, AT&T states:

1. AT&T is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Columbia exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about October 19, 2020, AT&T submitted a Pooling Administration System request for the assignment of ten thousands-blocks (other than with a 666 NXX) in the Columbia rate center to integrate into its customer's existing dialing plan. In order to meet the customer's express request for numbers,⁹ AT&T requested the assignment of ten thousands-blocks in the Columbia rate center.¹⁰ AT&T does not have the existing numbers to meet the customer's

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

¹⁰ See Exhibit B to this Petition.

request and, therefore, is requesting that a new code be opened and these numbers be assigned to it.

8. AT&T's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T filled out the necessary MTE Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Columbia Rate Center had an MTE of 171.045 months and a utilization of 26.068%.¹¹

10. Thereafter, also on October 19, 2020, AT&T's request was denied because AT&T had not met the MTE criterion now set forth in the INC Guidelines.¹² AT&T's numbering resource requests were denied despite the fact that AT&T does not have adequate numbering resources needed to satisfy this customer's demands in the Columbia Rate Center.

11. AT&T's inability to provide this important customer with the requested numbering resources prevents AT&T from providing the quality of service this customer desires, needs, and expects. If AT&T is not assigned the numbering resources needed to meet the customer's request, AT&T will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."¹³

¹¹ *See Id.*

¹² *See Id.*

¹³ *Second NRO Order* at ¶ 61.

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory."¹⁵ In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."¹⁶

14. AT&T requests that the Commission reverse the decision to withhold numbering resources from AT&T because that decision interferes with AT&T's ability to provide telecommunication services to its customers.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T to meet customer needs.

WHEREFORE, AT&T requests that the Commission:

- A. Reverse the decision to deny AT&T's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide ten thousands-blocks (other than with a 666 NXX) in the Columbia rate center; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 28th day of October 2020.



Patrick W. Turner
Assistant Vice President – Sr. Legal Counsel
One CNN Center, SW1424B
Atlanta, GA 30303
(404) 893-7940

ATTORNEY FOR AT&T SOUTH CAROLINA



August 31, 2020

AT&T

Order Tracking #072920OSW51232TD

Midlands Technical College is requesting a block of 10,000 consecutive Direct Inward Dial numbers, issued from the 839 area code in the Columbia TMRC (i.e. 839-XXX-0000 – 839-XXX-9999, consecutively). These numbers would be assigned to the following site:

316 S Beltline Blvd

803-738-7029

CLLI: CLMASCSU78E

TMRC: COLUMBIA

Midlands Technical College serves students on 6 different campuses, 4 of which are in the Columbia area, as well as Fort Jackson. Each location currently uses one or more different exchanges. A consecutive block of numbers would be a vast improvement in the clarity and consistency of our directory listings, helping us to better serve our students. As more of our workforce finds itself moving between multiple campuses, it would also improve number extension portability for our faculty and staff.

Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "Tony Hough", written over a horizontal line.

Tony Hough

Director of Information Resource Management

Central Office Code (NPA-NXX) Application - Part 1
Revised: October 31, 2019

Tracking
Number: **839-COLUMBIA-SC-1316832**

**Full NXX: Dedicated
Customer**

Type of Application: ☒ New ☐ Change¹
☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity
Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Headquarters
Address: **2600 Camino Ramon**

City, State, Zip: **San Ramon, CA, 94583**

Contact Name: **Aida Armesto**

Contact
Address: **600 NW 79 Ave**

City: **Miami** State: **FL** ZIP: **33126**

Phone: **305-341-8707** Fax : **305-
264-
2918**

E-mail: **aida.armesto@att.com**

Code Administrator:²

Name: **Patricia Soderland**

Address: **2411 Dulles Corner Park Suite 250**

City: **Herndon** State: **VA** ZIP: **20171**

Phone: **571-363-3828** Fax : **571-
363-
3838**

NXX:³ LATA: **434**
1.2 NPA: **839** OCN:⁴**9417** Parent Company's
OCN(s) **9400**

Switching Identification (Switching Entity/POI)

⁵**CLMASCSU78E**

Locality/City/Wire Center:

Rate
Center:⁶**COLUMBIA**

Homing Tandem Operating Co.⁷: **BELLSOUTH
TELECOMM INC DBA SOUTHERN BELL TEL &
TEL**

Tandem Homing
CLLI^{TM8}: **CLMASCSN60T**

1.3 Dates

Date of Application: **10/19/2020**

Requested Effective

Date:^{9,10}

12/24/2020

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment Yes **X** No

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation: **WE ARE SERVING AS OUR OWN AOCN AND
WILL WAIVE THE 1-7 DAYS TO UPDATE BIRRDs**

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS,
Other): **Incumbent Local Exchange Carrier (ILEC)**

b) Type of service (e.g., Cellular - Type 2): **Wireline**

c) Code Assignment Preference (Optional) **CUSTOMER IS
REQUESTING 10K IN THE NEW 839 NPA**

d) Codes that are undesirable, if any **666**

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐
Tandem Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend
Reservations

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): **Midlands Technical College is requesting a block of 10,000 6 different campuses**

1.8 It is the Code Applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

Comments:

I hereby certify that the above information requesting a CO Code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.¹⁴

Aida Armesto

Sr Specialist Database Admin

10/19/2020

Signature of Code Applicant

Title

Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from the North American Numbering Plan Administrator (NANPA).

³The NXX field is required for any Central Office (CO) Code (NPA-NXX) request in which there is a change or the CO Code is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telecom Routing Administration (TRA) on 732-699-6700.

⁵This is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing

calls. This is the eleven-character iconectiv[®] Common Language Location Identification (CLLI[™]) Code of the applicant's Switching Entity/POI. (iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.)

⁶Rate Center name shall be a tariffed Rate Center associated with toll billing.

⁷Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

⁹Central Office (CO) Code Applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to Activation of a CO Code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

¹¹Select if you are the current Central Office (CO) Code Holder.

¹²Select if you are not the current Central Office (CO) Code Holder.

¹³The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling and shall leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Tracking Number: **839-COLUMBIA-SC-1316832**

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

Full NXX:
Dedicated
Customer

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Headquarters Address: **2600 Camino Ramon**

City: **San Ramon** State: **CA** ZIP: **94583**

Contact Name: **Aida Armesto**

Contact Address: **600 NW 79 Ave**

City: **Miami** State: **FL** ZIP: **33126**

Phone: **305-341-8707** Fax: **305-264-2918**

E-mail: **aida.armesto@att.com**

Pooling Administrator:ⁱⁱ

Contact Name: **John Auerbach**

Contact Address: **1800 Sutter St. Ste. 780**

City: **Concord** State: **CA** ZIP: **94520**

Phone: **925-420-0343** Fax: **925-420-0377**

E-mail: **jauerbach@somos.com**

1.2 General Information:

Check one : No LRN needed **X** LRN neededⁱⁱⁱ: _____

NPA: **839** LATA: **434** OCN^{iv}: **9417** Parent Company's OCN **9400**

Number of Thousands-Blocks Requested : **10**

Switch Identification (Switching Entity/POI^v):

CLMASCSU78E

Rate Center^{vi}: **COLUMBIA**

1.3 Dates:

Date of Application^{vii}: **10/19/2020**

Requested Effective Date^{viii}: **12/24/2020**

Requested Expedited Treatment? (See Section 8.6) Yes **X** No _____

Expedited Explanation: **WE ARE SERVING AS OUR OWN AOCN AND WILL WAIVE THE 1-7 DAYS TO UPDATE BIRRDs**

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : **Incumbent Local Exchange Carrier (ILEC)**
(LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : **Wireline**

c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____
CUSTOMER IS REQUESTING 10K IN THE NEW 839 NPA

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any **666**

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) **N/A**

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes **X** If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in **red** and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

☐ OCN: Intra-company^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____
- d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Aida Armesto

Sr Specialist Database Admin

10/19/2020

Signature of Block Applicant Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 839-COLUMBIA-SC-1316832Date: Monday,
October 19, 2020OCN: 9417Company Name: BELLSOUTH TELECOMM INC DBA
SOUTHERN BELL TEL & TELRate Center: COLUMBIA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 803-210-0, 803-210-1, 803-210-2, 803-210-3, 803-210-4, 803-212-1, 803-212-2, 803-212-3, 803-212-4, 803-212-6, 803-212-7, 803-213-0, 803-213-1, 803-213-2, 803-213-3, 803-213-4, 803-213-5, 803-213-6, 803-213-7, 803-213-8, 803-216-0, 803-216-2, 803-216-3, 803-216-6, 803-216-7, 803-216-8, 803-216-9, 803-231-1, 803-231-2, 803-231-3, 803-231-4, 803-231-5, 803-231-6, 803-231-7, 803-251-0, 803-251-1, 803-251-2, 803-251-3, 803-251-4, 803-251-5, 803-251-6, 803-251-7, 803-251-8, 803-312-6, 803-312-7, 803-312-8, 803-312-9, 803-314-0, 803-314-1, 803-314-2, 803-314-3, 803-314-4, 803-314-5, 803-314-6, 803-314-7, 803-314-8, 803-314-9, 803-343-0, 803-343-1, 803-343-2, 803-343-3, 803-343-4, 803-343-5, 803-343-6, 803-343-7, 803-343-8, 803-354-9, 803-376-0, 803-376-1, 803-376-2, 803-376-4, 803-376-5, 803-376-6, 803-376-8, 803-376-9, 803-400-0, 803-400-1, 803-400-4, 803-400-5, 803-400-7, 803-400-9, 803-401-0, 803-401-1, 803-401-2, 803-401-3, 803-401-4, 803-401-6, 803-401-7, 803-401-8, 803-401-9, 803-462-0, 803-462-1, 803-462-2, 803-462-3, 803-462-6, 803-462-7, 803-462-8, 803-462-9, 803-476-3, 803-476-4, 803-476-8, 803-540-0, 803-540-1, 803-540-2, 803-540-3, 803-540-4, 803-540-7, 803-540-8, 803-540-9, 803-561-0, 803-561-1, 803-561-2, 803-561-3, 803-561-4, 803-561-5, 803-561-7, 803-561-8, 803-561-9, 803-567-7, 803-567-8, 803-576-1, 803-576-2, 803-576-3, 803-576-5, 803-576-6, 803-576-7, 803-576-8, 803-576-9, 803-612-1, 803-612-2, 803-612-3, 803-612-4, 803-612-5, 803-612-6, 803-612-7, 803-612-8, 803-647-0, 803-647-1, 803-647-2, 803-647-3, 803-647-5, 803-647-6, 803-647-7, 803-647-8, 803-647-9, 803-714-0, 803-714-1, 803-714-2, 803-714-4, 803-714-5, 803-714-6, 803-714-7, 803-714-8, 803-714-9, 803-735-0, 803-735-1, 803-735-2, 803-735-3, 803-735-4, 803-735-7, 803-735-8, 803-735-9, 803-738-0, 803-738-1, 803-738-2, 803-738-3, 803-738-4, 803-738-7, 803-738-8, 803-738-9, 803-741-0, 803-741-1, 803-741-2, 803-741-3, 803-741-7, 803-741-9, 803-743-0, 803-743-1, 803-743-4, 803-743-9, 803-748-0, 803-748-1, 803-748-2, 803-748-3, 803-748-4, 803-748-7, 803-748-8, 803-748-9, 803-758-0, 803-758-1, 803-758-2, 803-758-4, 803-758-5, 803-758-6, 803-758-7, 803-758-8, 803-758-9, 803-765-0, 803-765-1, 803-765-2, 803-765-3, 803-765-4, 803-765-5, 803-765-6, 803-765-7, 803-765-9, 803-766-5, 803-771-0, 803-771-2, 803-771-3, 803-771-4, 803-771-5, 803-771-6, 803-771-7, 803-771-8, 803-771-9, 803-806-3, 803-806-4, 803-806-5, 803-806-6, 803-806-8, 803-822-0, 803-822-1, 803-822-2, 803-822-3, 803-822-4, 803-822-5, 803-822-6, 803-822-7, 803-822-8, 803-832-8, 803-832-9, 803-863-0, 803-863-1, 803-863-2, 803-863-3, 803-863-4, 803-863-5, 803-863-6, 803-863-7, 803-863-8, 803-863-9, 803-870-0, 803-870-1, 803-870-2, 803-870-3, 803-870-4, 803-870-5, 803-870-6, 803-870-7, 803-870-8, 803-870-9, 803-907-0, 803-907-1, 803-907-2, 803-907-3, 803-907-4, 803-907-5, 803-907-6, 803-907-7, 803-907-8, 803-907-9, 803-929-0, 803-929-1, 803-929-2, 803-929-3, 803-929-4, 803-929-5, 803-929-6, 803-929-9, 803-931-0, 803-931-1, 803-931-5, 803-931-7, 803-931-8, 803-931-9, 803-933-0, 803-933-1, 803-933-3, 803-933-6, 803-933-7, 803-933-8, 803-933-9, 803-935-0, 803-935-1, 803-935-2, 803-935-3, 803-935-4, 803-935-5, 803-935-6, 803-935-7, 803-935-8,

803-935-9, 803-936-0, 803-936-1, 803-936-3, 803-936-4, 803-936-5, 803-936-6, 803-936-7, 803-936-8, 803-936-9, 803-939-0, 803-939-1, 803-939-3, 803-939-4, 803-939-7, 803-939-8, 803-939-9, 803-955-0, 803-955-1, 803-955-2, 803-955-3, 803-955-4, 803-955-9, 803-988-0, 803-988-1, 803-988-2, 803-988-3, 803-988-4, 803-988-7, 803-988-8, 803-214, 803-252, 803-253, 803-254, 803-255, 803-256, 803-264, 803-296, 803-333, 803-344, 803-382, 803-407, 803-419, 803-434, 803-544, 803-545, 803-551, 803-691, 803-695, 803-699, 803-731, 803-732, 803-733, 803-734, 803-736, 803-737, 803-739, 803-742, 803-749, 803-750, 803-754, 803-755, 803-763, 803-772, 803-776, 803-777, 803-779, 803-781, 803-782, 803-783, 803-786, 803-787, 803-788, 803-790, 803-791, 803-794, 803-796, 803-798, 803-799, 803-865, 803-896, 803-898, 803-926, 803-975,

Name of Block Applicant: Aida Armesto

Signature: Aida Armesto

Title: Sr Specialist Database Admin
264-2918

Phone: 305-341-8707-

Fax: 305-

E-Mail: aida.armesto@att.com

A. Available Numbers³: 273587

B. Assigned Numbers: 224702

C. Total Numbering Resources⁴: 862000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: 0

List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth
History -
Previous 6
months⁶

<u>112</u>	<u>-152</u>	<u>-68</u>	<u>-196</u>	<u>-80</u>	<u>-20</u>
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<u>-67</u>	<u>-67</u>	<u>9932</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>	<u>-67</u>
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F. Forecast -
Next 12
months⁷

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: **1599.5**

H. Months
to Exhaust⁹
=
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	273587	171.045

I.
Utilization¹⁰
=
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \mathbf{26.068}$$

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

²List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-

populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

⁶Net change in Telephone Numbers (TN) no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number :	839-COLUMBIA-SC-1316832		
Date of Application:	10/19/2020	Effective Date:	
Date of Receipt:	10/19/2020	Date of Response:	10/19/2020
Service Provider Name:	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
(LERG TM Routing Guide ¹) OCN:	9417		
Parent Company OCN:	9400		
NPAC SOA SPID :			
Pooling Administrator Contact Information:			
John Auerbach	Phone:	925-420-0343	
Signature of Pooling Administrator			
John Auerbach	Fax:	925-420-0377	
Name (print)			
Email:	<u>jauerbach@somos.com</u>		
NPA-NXX or NPA-NXX-X :	Block Assigned: _____		
	Block Reserved : _____		
	Block Reservation Expiration Date : _____		
	Block/Code Modified : _____		
	Block/Code Disconnected : _____		
Block Contaminated (Yes or No):	_____		
If yes, enter the number of TNs contaminated (1-1000):	_____		
Switch Identification (Switching/POI) ² :	CLMASCSU78E		
Rate Center:	COLUMBIA		

✗ Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Susan Hodge, hereby certifies that she is employed by the Legal Department for AT&T South Carolina and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Columbia Rate Center to be served by the method indicated below upon the following this 28th day of October, 2020:

Beth Sprague
NANPA
Somos
2411 Dulles Corner Park Suite 250
Herndon, VA 20171
(Electronic Mail bsprague@somos.com)

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s/ Susan Hodge

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